REMARKS

Claims 1, 3, 4, 5 and 7, amended for matters of form by this paper, are the only active claims pending in this application. Claim 6 is canceled by this paper, and claim 2 was previously canceled. The foregoing separate sheets marked as "Listing of Claims" shows all the claims in the application, each with an indication at its first line showing the claim's current status.

The Office Action rejects claims 1 and 3-7 under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. 2002/0169658 ("Adler"). Office Action at pp. 2-8.

Applicant respectfully traverses the rejections; Adler lacks elements of Applicant's base claims 1 and 7 and therefore does not anticipate the claims under 35 U.S.C. § 102.

Applicant respectfully submits, as if set forth here in the entirety, the REMARKS of Applicant's previous response. Applicant also respectfully submits additional factual differences between Applicant's claims and Adler.

Applicant's claim 1 defines a method for representing, in a single BDML framework, the worldview of each of a plurality of business decisions associated with different business processes within a set of linked processes. Each of the different business decisions is represented by a portable BDML document, having specific tags according to the single BDML framework.

Claims 1 recites providing a BDML framework for representing a world view of a plurality of decisions, the framework having a business objectives tag definition for quantitatively representing a business objective, constraints tag definition, assumptions tag definition, data tag definition, and an underlying model tag definition for identifying a business decision mathematical algorithm. Claim 7 recites a corresponding structural element. Adler lacks these claim elements.

Adler, to the extent it can be understood, appears to develop a "set of modeling and analysis tools ... to help companies make informed strategic

decisions". Applicant submits that it is well known in the art that decisions can be modeled at several different levels, viz., strategic, tactic and operational. Adler, to the extent it can be understood, does not describe a general purpose Business Decision Modeling Language. Instead, Adler appears to describe modeling and analysis of the decisions only at a "strategic" level. Applicant submits this statement is supported by the textual and graphical expositions throughout the patent. For example, in the Business Decision Modeling Framework (Figure 4 and Paragraph Col. 11: 0099), all the modeling elements ("Economy", "Market", etc.) are of concerns to typical strategic level decision-making. However, due to its focus on strategic level decision models, it is necessary that the resulting Framework be generalized before it becomes applicable to model general business decisions and their interactions.

Claim 1 recites checking logical consistency between different business decisions, based on the tags of the BDML documents. Claim 7 recites a comparable element. Adler lacks these elements, because Adler's strategic level Business Decision Modeling Framework *cannot* handle the checking the consistency of the decision in this example. Adler's Framework relies on modeling elements (Objects) like the one displayed in Figure 4, and parts ordering decisions (and bills of materials) are not part of Adler's Framework. As such, the consistency of the parts and capacity ordering decisions *cannot* be checked using Adler's Business Decision Modeling Framework.

Adler therefore cannot anticipate Applicant's claim 1 or 7.

In further support, Applicant submits Adler describes OOP for implementing the corresponding tools while describing UML for the modeling purposes of his Framework. This must be considered because certain terminologies appearing within OOP have different meanings than the same terminologies appearing within UML. This fact must be considered – otherwise a reference may be interpreted as disclosing more, or less, than it actually discloses.

For example, as known to persons of ordinary skill in the relevant arts, the term "constraint" in the context of a UML model has a meaning quite different from the "constraint" used in a standard decision model. The meaning in the UML is mainly to capture a property of the context, e.g., the restrictions on the attributes of a class. The constraints in a decision model, on the other hand, represent restrictions on the decision variables.

Second, UML has an ability to define the relationships among different objects. As known in the art, these relationships are relatively simplistic compared to the ones captured by typical decision models. Stated with greater specificity, the relationships represented in UML are mainly to capture the association and multiplicity among the objects (e.g., Object A "requires" Object B and one Object A associates with N Object B). In the decision models, on the other hand, and as known to persons skilled in the relevant art, the relationships among different decisions are very different and much more complex. As also known to such persons, this in turn means that to fully express such relationships, complex mathematical formulae and expressions are required.

As a result, as further known to persons skilled in the relevant art, the consistency and error checking in decision models requires different and often more involved efforts than those in UML/OOP models. For example, as known to such persons, decisions in one area of interrelated businesses are often required to be consistent with those of other areas.

As an illustrative example, Applicant respectfully submits the following: a production planning setting, a production planner may need to prepare for the production of a given product by making a consistent set of decisions including the ordering certain quantities of the required parts, and arranging sufficient assembly capacities to assemble the parts into the final products based on the bill of materials and other factors. A problem, though, is that the quantities of the parts ordered and production capacity arranged should be at the levels that are consistent with the required volume of the products.

Applicant's claims 1 and 7 solve the problem illustrated by the above example, by checking the consistency of the decisions, this being greatly facilitated by representing the decisions as according to the claimed BDML documents in the aimed BDML format. Adler does not teach, disclose or suggest this feature.

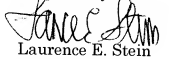
Conclusion

In view of the foregoing, Applicant respectfully requests that the application be reconsidered, that all rejections be withdrawn, that claims 1, 3, 4, 5 and 7 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, Applicant's undersigned counsel respectfully requests the Examiner contact the undersigned to discuss any other changes deemed necessary in a telephonic or personal interview.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Deposit Account 50-0510 (IBM-Yorktown).

Respectfully submitted,



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